

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK**

Civil Action No.: 1:22-CV-03318-DEH

Floyd's of Leadville, Inc. N/K/A Valued, Inc.,

Plaintiff,

v.

Alexander Capital L.P., et al.

Defendants.

---

**NOTICE OF MOTION AND MOTION FOR ATTORNEY FEES**

---

PLEASE TAKE NOTICE THAT, upon the memorandum of law in support dated MAY 30, 2024, Plaintiff Floyd's of Leadville, Inc. n/k/a Valued Inc. ("Plaintiff") will move this Court, the Honorable Dale E. Ho, presiding, at the federal courthouse located at 40 Foley Square, New York, NY 10007, or through a telephonic or Zoom hearing at the Court's directive, on a date and in a manner to be set by the Court, for an Order awarding \$3,960 in attorney fees, jointly and severally, against Mark Leonard, Ronald Barrie Clapham, Paul Rachmuth, and Bryan McKenna.

This motion is supported by the accompanying memorandum and Declaration of Daniel J. Vedra.

Dated: May 30, 2024

Respectfully submitted,

/s/ Daniel J. Vedra \_\_\_\_\_

Daniel J. Vedra  
Vedra Law LLC  
1444 Blake Street  
Denver, CO 80202  
Phone: (303) 937-6540  
Fax: (303) 937-6547  
Email: dan@vedralaw.com

**CERTIFICATE OF SERVICE**

I hereby certify that on the date first written above the foregoing was served CM/ECF on all parties of record.

/s/ Daniel J. Vedra

Daniel J. Vedra